

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

V&A Collection, LLC

*Plaintiff,*

-against-

Guzzini Properties Ltd.,

*Defendant.*

Case No. 20-cv-01797 (KPF)

Hon. Katherine Polk Failla

**DECLARATION OF JUDD B. GROSSMAN, ESQ.  
IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

I, Judd B. Grossman, Esq., an attorney admitted to practice before this Court and the Courts of the State of New York, hereby declare under penalty of perjury as follows:

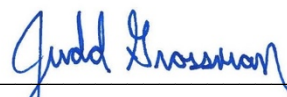
1. I represent Plaintiff V&A Collection, LLC ("V&A") in this action and I submit this Declaration in opposition to Defendant Guzzini Properties Ltd.'s motion to dismiss.

2. A true and correct copy of V&A's February 26, 2020, Verified Complaint, filed in the Supreme Court of the State of New York, County of New York, Index No. 651300/2020, is attached as **Exhibit 1**.

3. A true and correct copy of the June 29, 2013, email from Inigo Philbrick, on behalf of Modern Collections, to Andre Sakhai, on behalf of V&A, is attached as **Exhibit 2**.

4. A true and correct copy of the June 28, 2017, agreement between Guzzini Properties Ltd. and Inigo Philbrick Ltd. is attached as **Exhibit 3**.

Dated: September 4, 2020  
New York, New York

  
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Judd B. Grossman